

<u>10a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	New tires and a front end alignment
<u>10b</u>	<u>MGL Ch 268A</u>	Check No. 630 for \$336.00 on or about 02/17/98	on defendant ARTHUR SOTIRION's father's Cadillac Fleetwood
<u>11a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Automotive work and materials for the personal vehicle of a member of the Asselin family or Sotirion family
<u>11b</u>	<u>MGL Ch 268A</u>	Check No. 631 for \$277.00 on or about 02/20/98	
<u>12a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Cherry kitchen cabinets installed at the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>12b</u>	<u>MGL Ch 268A</u>	Check No. 643 for \$7,690.57 on or about 03/27/98	
<u>13a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Corian countertop installed at the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>13b</u>	<u>MGL Ch 268A</u>	Check No. 650 for \$6,003.90 on or about 04/28/98	
<u>14a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Approximately 209 yards of loam to the residence of defendants JOSEPH and MELINDA ASSELIN
<u>14b</u>	<u>MGL Ch 268A</u>	Check No. 666 for \$2,518.40 on or about 05/24/98	
<u>15a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Transportation of a bulldozer used to grade the lawn at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>15b</u>	<u>MGL Ch 268A</u>	Check No. 670 for \$225.00 on or about 05/26/98	
<u>16a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Personal computer equipment delivered to defendant SOTIRION
<u>16b</u>	<u>MGL Ch 268A</u>	Check No. 687 for \$3,772.50 on or about 07/09/98	
<u>17a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	New driveway installed at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>17b</u>	<u>MGL Ch 268A</u>	Check No. 800 for \$7,500.00 on or about 08/20/98	

<u>18a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	A Broilemaster Premium "P" Series
<u>18b</u>	<u>MGL Ch 268A</u>	Check No. 723 for \$2,340.35 on or about 08/27/98	Premium "P" Series and two Deluxe "D" Series Stainless Steel Grills for defendants ASSELIN, SR. and SOTIRION
<u>19a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Three yards of concrete at the residence of defendant SOTIRION
<u>19b</u>	<u>MGL Ch 268A</u>	Check No. 726 for \$255.15 on or about 09/08/98	
<u>20a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Big E tickets delivered to defendant SOTIRION
<u>20b</u>	<u>MGL Ch 268A</u>	Check No. 738 for \$550.00 on or about 09/27/98	
<u>21a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Whirlpool appliance for a member of the Asselin or Sotirion family
<u>21b</u>	<u>MGL Ch 268A</u>	Check No. 756 for \$391.95 on or about 11/20/98	
<u>22a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Bosch dishwasher, General Electric refrigerator, Whirlpool stove, and another Whirlpool appliance for a member of the Asselin or Sotirion family
<u>22b</u>	<u>MGL Ch 268A</u>	Check No. 755 for \$4,100.00 on or about 11/22/98	
<u>23a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Personal electronic equipment for members of the Asselin or Sotirion family
<u>23b</u>	<u>MGL Ch 268A</u>	Check No. 762 for \$1,390.20 on or about 12/21/98	
<u>24a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Granite countertop installed in the residence of defendants RAYMOND and JANET ASSELIN, SR.
<u>24b</u>	<u>MGL Ch 268A</u>	Check No. 770 for \$3,390.00 on or about 02/09/99	
<u>25a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Check delivered to defendant SOTIRION and subsequently cashed
<u>25b</u>	<u>MGL Ch 268A</u>	Check No. 779 for \$1,500.00 on or about 06/08/99	

<u>26a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 781 for \$482.55 on or about 06/24/99	Payment for four new tires on defendant JANET ASSELIN's Chrysler LeBaron
<u>27a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 782 for \$6,630.00 on or about 06/24/99	Approximately 40,000 to 60,000 letters and 30,000 to 40,000 envelopes for defendant CHRISTOPHER ASSELIN's 1998 campaign for state representative
<u>28a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 784 for \$792.68 on or about 07/07/99	Lumber and materials for a new deck at defendant JAMES ASSELIN's residence
<u>29a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 789 for \$6,750.00 on or about 07/26/99	New residential roof and barn roof at the residence of defendant SOTIRION's sister
<u>30a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 793 for \$1,125.00 on or about 08/11/99	Pressure treated decking, two storm windows, and a load of mulch installed at defendant SOTIRION's rental property
<u>31a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 794 for \$2,375.00 on or about 08/11/99	Automotive work on defendant SOTIRION's personal vehicles and his daughter's Ford Taurus
<u>32a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 802 for \$8,314.78 on or about 08/21/99	New indoor air conditioning system installed at the residence of defendant RAYMOND and JANET ASSELIN, SR.

<u>33a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Sliding french door installed at the residence of defendant ASSELIN, JR.
<u>33b</u>	<u>MGL Ch 268A</u>	Check No. 809 for \$1,267.13 on or about 09/02/99	
<u>34a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Forty twenty foot lengths of Trex decking installed on the deck of a member of the Asselin or Sotirion family
<u>34b</u>	<u>MGL Ch 268A</u>	Check No. 820 for \$1,167.00 on or about 09/27/99	
<u>35a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Payment for lumber and materials at the residence of defendant ASSELIN, JR.
<u>35b</u>	<u>MGL Ch 268A</u>	Check No. 822 for \$921.78 on or about 10/01/99	
<u>36a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Gas grill purchased by defendant SOTIRION
<u>36b</u>	<u>MGL Ch 268A</u>	Check No. 824 for \$1,000.00 on or about 10/01/99	
<u>37a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Windows and gutters installed at the residence of defendant JAMES ASSELIN
<u>37b</u>	<u>MGL Ch 268A</u>	Check No. 825 for \$8,400.00 on or about 10/07/99	
<u>38a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Frigidaire stove and refrigerator for the residence of defendant MARIA SERRAZINA; and a General Electric microwave, Jenn-Air stove, and Whirlpool washer and dryer for the residence of defendant JAMES ASSELIN
<u>38b</u>	<u>MGL Ch 268A</u>	Check No. 826 for \$5,334.00 on or about 10/08/99	
<u>39a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Check delivered to defendant SOTIRION and subsequently cashed
<u>39b</u>	<u>MGL Ch 268A</u>	Check No. 828 for \$1,500.00 on or about 10/21/99	

<u>40a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Check delivered to defendant SOTIRION
<u>40b</u>	<u>MGL Ch 268A</u>	Check No. 834 for \$6,000.00 on or about 11/08/99	and subsequently cashed
<u>41a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Cedar fence installed at the residence of defendant SOTIRION
<u>41b</u>	<u>MGL Ch 268A</u>	Check No. 836 for \$4,850.00 on or about 11/22/99	
<u>42a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Four mirrors installed at the residence of JOSEPH and MELINDA ASSELIN
<u>42b</u>	<u>MGL Ch 268A</u>	Check No. 841 for \$800.00 on or about 12/21/99	
<u>43a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Digital camera, a DVD player, and other pieces of electronic equipment received by defendant SOTIRION
<u>43b</u>	<u>MGL Ch 268A</u>	Check No. 845 for \$2,460.00 on or about 01/05/00	
<u>44a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Reconditioned transmission and other automotive work on the personal vehicle of defendant SOTIRION's daughter
<u>44b</u>	<u>MGL Ch 268A</u>	Check No. 847 for \$2,130.00 on or about 01/14/00	
<u>45a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Payment for a coin wrapping machine for defendant ASSELIN, SR. and defendant SOTIRION's quarter skimming scheme
<u>45b</u>	<u>MGL Ch 268A</u>	Check No. 848 for \$1,864.00 on or about 01/20/00	
<u>46a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	First installment of \$100,000.00 payment to defendant SOTIRION on behalf of his brother
<u>46b</u>	<u>MGL Ch 268A</u>	Check No. 853 for \$50,000.00 on or about 03/17/00	
<u>47a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Lumber and materials for a new deck at the residence of defendant RAYMOND ASSELIN, JR.
<u>47b</u>	<u>MGL Ch 268A</u>	Check Nos. 865 and 879 totaling \$1,114.13 on or about 05/05/00	

<u>48a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Catering services
<u>48b</u>	<u>MGL Ch 268A</u>	Check No. 884 for \$630.00 on or about 06/24/00	for a campaign function held on behalf of defendant CHRISTOPHER ASSELIN
<u>49a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Automotive work on
<u>49b</u>	<u>MGL Ch 268A</u>	Check No. 893 for \$3,059.00 on or about 07/26/00	defendant JANET ASSELIN's Chrysler LeBaron and other personal vehicles belonging to members of the Asselin and Sorition family
<u>50a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Final installment of
<u>50b</u>	<u>MGL Ch 268A</u>	Check No. 923 for \$50,000.00 on or about 08/15/00	\$100,000.00 payment to defendant SOTIRION on behalf of his brother
<u>51a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Hanson twenty pound
<u>51b</u>	<u>MGL Ch 268A</u>	Check No. 946 for \$493.50 on or about 10/02/00	gas grill propane cylinders and a Ducane gas grill replacement part for members of the Asselin and Sotirion families
<u>52a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Body work on
<u>52b</u>	<u>MGL Ch 268A</u>	Check No. 1000 for \$2,430.00 on or about 11/08/00	defendant SOTIRION's 1991 Cadillac and defendant JANET ASSELIN'S 1992 Chrysler LeBaron
<u>53a</u>	<u>18 USC 201</u>	G & R Associates, Inc.	Check delivered to
<u>53b</u>	<u>MGL Ch 268A</u>	Check No. 1014 for \$800.00 on or about 11/15/00	defendant SOTIRION and subsequently cashed

<u>54a</u> <u>54b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1053 for \$3,139.35 on or about 01/17/01	Dell Pentium computer, office table, and highback leather chair for defendant CHRISTOPHER ASSELIN's office, and a 32" Sony television delivered to the residence of defendant ARTHUR SOTIRION
<u>55a</u> <u>55b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1067 for \$5,957.51 on or about 05/21/01	New windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR.
<u>56a</u> <u>56b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1070 for \$650.00 on or about 04/20/01	Tree service work to prepare for the installation of an in-ground swimming pool at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>57a</u> <u>57b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1078 for \$725.00 on or about 05/08/01	Approximately twenty-five water filters for defendant ASSELIN, SR.
<u>58a</u> <u>58b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1079 for \$2,100.00 on or about	Labor to install new windows at the residences of defendants CHRISTOPHER and MERYLINA ASSELIN, and defendant ASSELIN, JR.

<u>59a</u> <u>59b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1083 for \$8,100.00 on or about 05/16/01	Partial payment of an in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>60a</u> <u>60b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1089 for \$2,100.00 on or about 06/08/01	Partial payment of in-ground swimming pool and slide installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>61a</u> <u>61b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1094 for \$5,928.69 on or about 06/29/01	An alarm system installed at the residence of defendant MARIA SERRAZINA; a central vacuum system and an updated alarm panel installed at the rental property of defendant ARTHUR SOTIRION; and a global positioning system device for an automobile
<u>62a</u> <u>62b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1104 for \$6,000.00 on or about 08/26/01	Carport roof installed at the residence of defendants RAYMOND and JANET ASSELIN, SR.; construction of a front porch at the residence of defendant MARIA SERRAZINA; and various roof jobs at the residence of defendant ARTHUR SOTIRION's father

<u>63a</u> <u>63b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1120 for \$5,000.00 on or about 09/06/01	Exterior painting of the residence of defendants CHRISTOPHER and MARYLINA ASSELIN, and trim work at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>64a</u> <u>64b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1129 for \$2,480.00 on or about 10/15/01	Approximately 20,000 to 30,000 campaign letters and 10,000 to 15,000 campaign envelopes for defendant CHRISTOPHER ASSELIN
<u>65a</u> <u>65b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1130 for \$3,502.89 on or about 10/15/01	Washer and dryer delivered by Lowes to the residence of defendants CHRISTOPHER and MARYLINA ASSELIN; Sony recorder delivered to defendant SOTIRION; Big E tickets and an Olympus digital camera for members of the Asselin or Sotirion families
<u>66a</u> <u>66b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1137 for \$661.50 on or about 11/14/01	Payment for seven hundred fifty (750) invitations and response cards for the Dolly Asselin Retirement Party
<u>67a</u> <u>67b</u>	<u>18 USC 201</u> MGL Ch 268A	G & R Associates, Inc. Check No. 1161 for \$1,165.50 on or about 12/15/01	Two upright Hoover vacuums and a Canon copier for members of the Asselin and Sotirion families

<u>68a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1163 for \$600.00 on or about 12/27/01	One hundred Showcase Cinema movie tickets delivered to defendant SOTIRION
<u>69a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1166 for \$4,150.00 on or about 01/02/02	12' by 16' outdoor shed, built to match the existing house, installed at the residence of defendants JOSEPH and MELINDA ASSELIN
<u>70a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1168 for \$255.00 on or about 01/09/02	Four new tires on a personal vehicle of a member of the Asselin family or Sotirion family
<u>71a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1169 for \$1,870.00 on or about 01/08/02	Reconditioned transmission and other automotive work in defendant SOTIRION's personal vehicle
<u>72a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1187 for \$1,725.00 on or about 02/15/02	Reconditioned transmission and other automotive work on defendant SOTIRION's Cadillac Brougham
<u>73a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1197 for \$100,000.00 on or about 03/01/02	Payment related to the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN
<u>74a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1202 for \$7,000.00 on or about 03/15/02	Survey work at the Whately residence of defendant SOTIRION's sister

<u>75a</u>	<u>18 USC 201</u>	G & R Associates, Inc. Check No. 1211 for \$1,570.00 on or about 04/17/02	Catering services for a political event for defendant CHRISTOPHER ASSELIN
<u>75b</u>	MGL Ch 268A		

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

**Racketeering Acts 76 through 100**

39. Racketeering Acts 76 through 100 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and

otherwise provide preferential treatment during the terms of contracts to Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

**RAYMOND ASSELIN, SR.**  
**and**  
**ARTHUR SOTIRION,**

defendants herein, state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and

otherwise provide preferential treatment during the terms of contracts to Manny's Plumbing & Heating, Inc. and Manny's Plumbing & Heating, Inc./G & R Associates, Inc., a Joint Venture, all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	Thing of Value for Act a and b and Date	Beneficiary of Act a and b
76a 76b	18 USC 201 MGL Ch 268A	\$4,000.00 worth of free labor and materials on or about the fall, 1996	Plumbing installed at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
77a 77b	18 USC 201 MGL Ch 268A	\$10,201.52 worth of free labor and materials between 10/28/97 through 01/05/99	Plumbing system installed at the new residence of defendants JOSEPH and MELINDA ASSELIN
78a 78b	18 USC 201 MGL Ch 268A	Manny's Plumbing & Heating, Inc. Check Nos. 2305, 2419 and 3085 for \$10,000.00 between 12/08/97 and 04/28/98	Heating and air conditioning systems installed at the new residence of defendants JOSEPH and MELINDA ASSELIN
79a 79b	18 USC 201 MGL Ch 268A	\$2,131.42 worth of free labor and materials on or about 11/20/98	Stainless steel sink, sewage ejector and hot water heater installed at RayTron, Inc., the business of defendant ASSELIN, JR.
80a 80b	18 USC 201 MGL Ch 268A	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1033 for \$2,525.00 on or about 12/02/98	New house roof and shed roof at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

<u>81a</u>	<u>18 USC 201</u>	\$1,500.00 worth of free labor and materials in or about late 1998 and early 1999	Plumbing services performed at the residence of defendants RAYMOND and JANET ASSELIN, SR.
<u>82a</u>	<u>18 USC 201</u>	\$308.00 worth of free labor and materials on or about 03/25/99	Plumbing services for work done at the residence of defendant ARTHUR G. SOTIRION's parents
<u>83a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 4855 for \$8,015.27 on or about 06/26/99	A Black Quartz Corian kitchen countertop installed at the residence of defendant SOTIRION
<u>84a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc. payment of approximately \$3,000.00 in or about the fall, 1999	Labor related to the kitchen remodeling at the residence of defendant SOTIRION
<u>85a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc. Check No. 1104 for \$27,450.00 on or about 01/20/00	Repayment of loan taken from employer by defendant JOSEPH ASSELIN
<u>86a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc. Check No. for \$6,718.58 on or about 02/14/00	Kitchen cabinets installed at the residence of SHA's Chief Purchasing Agent
<u>87a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1129 for \$30,000.00 on or about 04/12/00	Money to Valley Floor Covering
<u>88a</u>	<u>18 USC 201</u>	\$12,245.68 worth of free labor and materials between on or about 11/00/99 and 06/00/00	Plumbing system installed at the residence of SHA's Chief Purchasing Agent

<u>89a</u> <u>89b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1162 for \$7,500.00 on or about 06/19/00	Siding, gutters, and several pairs of shutters installed at the residence of SHA's Chief Purchasing Agent
<u>90a</u> <u>90b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	\$25,000.00 in cash paid through a series of cash payments beginning in or about September, 2000	Cash to defendant SOTIRION
<u>91a</u> <u>91b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	\$5,000.00 in cash paid through a series of cash payments beginning in or about September, 2000	Cash to defendant SOTIRION
<u>92a</u> <u>92b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1270 for \$450.00 on or about 11/16/00	Twenty "Chris Asselin State Representative" signs measuring four feet by five feet for defendant CHRISTOPHER ASSELIN
<u>93a</u> <u>93b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1281 for \$2,800.00 on or about 12/12/00	New engine in SHA's Chief Purchasing Agent's van
<u>94a</u> <u>94b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	Manny's Plumbing & Heating, Inc./G & R Associates, Inc. Joint Venture Check No. 1294 for \$8,700.00 on or about 12/27/00	Approximately 60,000 to 80,000 letters and 40,000 to 50,000 envelopes for defendant CHRISTOPHER ASSELIN's 2000 campaign for state representative
<u>95a</u> <u>95b</u>	<u>18 USC 201</u> <u>MGL Ch 268A</u>	Manny's Plumbing & Heating, Inc. Check No. 7591 for \$787.97 on or about 03/22/01	Five maple kitchen cabinet units for the residence of defendant JAMES ASSELIN

<u>96a</u>	<u>18 USC 201</u>	\$1,678.16 worth of free plumbing materials and services on or about 08/01/01	Plumbing services at the rental property of defendant SOTIRION
<u>97a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc. Check No. 9398 for \$77,200.00 on or about 06/10/02	Partial payment towards outstanding debt owed to defendants ASSELIN, SR. and SOTIRION
<u>98a</u>	<u>18 USC 201</u>	Manny's Plumbing & Heating, Inc. Check No. 9399 for \$122,800.00 on or about 06/10/02	Payment related to the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN
<u>99a</u>	<u>18 USC 201</u>	\$258.56 worth of free plumbing materials and services on or about 06/14/02	Plumbing services at the rental property of defendant SOTIRION
<u>100a</u>	<u>18 USC 201</u>	\$5,958.05 worth of free plumbing materials and services on or about 09/30/02	Plumbing services for the installation of a 400,000 BTU pool heater at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

#### **Racketeering Acts 101 through 113**

40. Racketeering Acts 101 through 113 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.  
and  
ARTHUR SOTIRION,**

defendants herein, public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Peter Davis, d/b/a P.J. Richfield, Inc., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

**RAYMOND ASSELIN, SR.  
and  
ARTHUR SOTIRION,**

defendants herein, state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the

following things of value from Peter Davis, d/b/a P.J. Richfield, Inc., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3);

c. On or about the following dates, in the District of Massachusetts,

**PETER DAVIS,**

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to a public official, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, all with the intent to influence an official act of said public official; to influence said public official to commit and to aid in committing, and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and to induce said public official to do and omit to do an act in violation of his

official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Title 18, United States Code, Sections 201(b)(1)(A), (B), and (C);

d. On or about the following dates, in the Commonwealth of Massachusetts,

**PETER DAVIS,**

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to any state employee, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, with intent to influence any official act or any act within the official responsibility of said state employee; to influence said state employee to commit and aid in committing, and to collude in, and allow, any fraud, and make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and to induce said state employee to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Peter Davis, d/b/a P.J. Richfield, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections

2 (a) (1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a, b, c and d and Date</u>	<u>Beneficiary of Act a, b, c and d</u>
101a	18 USC 201	P.J. Richfield, Inc.	New cherry kitchen
101b	MGL Ch 268A	Check No. 1077 for	cabinets at the
101c	18 USC 201	\$2,491.32 on or about	residence of
101d	MGL Ch 268A	09/30/96	defendants CHRISTOPHER and MERYLINA ASSELIN
102a	18 USC 201	P.J. Richfield, Inc.	Exterior painting at
102b	MGL Ch 268A	Check No. 1079 for	the residence of
102c	18 USC 201	\$2,000.00 on or about	defendants CHRISTOPHER and
102d	MGL Ch 268A	10/01/96	MERYLINA ASSELIN
103a	18 USC 201	P.J. Richfield, Inc.	Labor to install
103b	MGL Ch 268A	Check No. 1080 for	ceramic tile at the
103c	18 USC 201	\$350.00 on or about	residence of
103d	MGL Ch 268A	10/01/96	defendants CHRISTOPHER and MERYLINA ASSELIN
104a	18 USC 201	P.J. Richfield, Inc.	Sanding and
104b	MGL Ch 268A	Check No. 1081 for	refinishing five
104c	18 USC 201	\$720.00 on or about	rooms at the
104d	MGL Ch 268A	10/02/96	residence of defendants CHRISTOPHER and MERYLINA ASSELIN
105a	18 USC 201	P.J. Richfield, Inc.	Labor for the
105b	MGL Ch 268A	Check No. 1571 for	framing of the new
105c	18 USC 201	\$7,400.00 on or about	residence of
105d	MGL Ch 268A	09/22/97	defendants JOSEPH and MELINDA ASSELIN
106a	18 USC 201	P.J. Richfield, Inc.	Fourteen storm
106b	MGL Ch 268A	Check No. 1576 for	windows installed at
106c	18 USC 201	\$1,338.24 on or about	the residence of
106d	MGL Ch 268A	10/07/97	defendants CHRISTOPHER and MERYLINA ASSELIN